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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KARL E. RISINGER, an individual, on
behalf of himself and all others similarly
situated,

Plaintiff,

vs.

SOC LLC, a Delaware limited liability
company registered and doing business in
Nevada as SOC NEVADA LLC; SOC-SMG,
INC., a Nevada corporation; DAY &
ZIMMERMANN, INC., a Maryland
corporation; and DOES 1-20, inclusive,

Defendants.

Case No.: 2:12-cv-00063-MMD-PAL

**STIPULATION TO EXTEND
DEADLINE FOR CLASS NOTICE AND
REQUEST TO AMEND POST-CLASS
CERTIFICATION SCHEDULING
ORDER**

1 WHEREAS, on December 29, 2017, at the status hearing before the Court, the parties
2 agreed to the form of a notice letter to be sent by mail to all class members and to continue meet
3 and confer efforts to reach agreement on a plan for internet notice;

4 WHEREAS, also at the December 29, 2017 hearing, the parties agreed to set a January 5,
5 2018 deadline to send class notice to all class members, which was adopted by the Court (Docket
6 No. 191);

7 WHEREAS, following the December 29, 2017 hearing, the parties have continued their
8 efforts to reach agreement on a plan for internet notice and it appears an agreement has been
9 reached pending receipt of additional information from Plaintiff's class notice administrator, Dahl
10 Administration, including drafts of proposed banner ads, the full list of websites on which the
11 internet notice would be posted, and the search terms that would trigger a banner ad for the class
12 notice;

13 WHEREAS, the parties have agreed to submit for approval from the Court their agreed
14 notice plan along with supporting materials to ensure that their proposed notice plan is sufficient
15 to meet the requirements of Federal Rule of Civil Procedure 23(c)(2)(B);

16 WHEREAS, Dahl Administration has indicated that it will be able to provide a list of
17 websites and search terms by early next week;

18 WHEREAS, Defendants have also discovered additional potential class members to be
19 added to the class list, representing persons that were not originally assigned to be armed guards,
20 but were later reclassified as armed guards, and have provided those additional individuals'
21 contact information to Plaintiff;

22 WHEREAS, due to the parties' continued efforts to finalize an internet notice plan and list
23 of recipients for mailing notice, and to receive approval of their notice plan from the Court, the
24 parties wish to extend the deadline to provide notice to class members to allow completion of a
25 joint notice plan for submission to the Court, so that notice can be provided to all class members
26 at the same time and after the Court has approved the joint notice plan, and to request that the
27 scheduling order be amended to reflect this new deadline;

28 WHEREAS, this request for an extension on the deadline to provide class notice will not

1 impact any of the other deadlines ordered by the Court, including discovery deadlines;

2 NOW THEREFORE, the parties, by and through their counsel of record, hereby stipulate
3 and agree to the following:

4 1. Plaintiff will submit to the Court the parties' joint proposed notice plan on January
5 10, 2018; in the event the parties cannot agree to a joint submission, Plaintiff will submit his
6 proposed notice plan on January 10, 2018.

7 2. If the Court approves the notice plan, notice will be mailed two days after the
8 Court's approval. The class notice will specify a 60-day opt-out period.

9 3. All other deadlines in this case remain unchanged.

11 Approved as to Form and Content,
12 Dated: January 5, 2018 EARLY SULLIVAN WRIGHT
13 GIZER & McRAE LLP

14 By: /s/--Scott E. Gizer
15 SCOTT E. GIZER
16 DEVIN A. MCRAE
17 Attorneys for Plaintiff

18 Dated: January 5, 2018 QUINN EMANUEL URQUHART & SULLIVAN
19 LLP

20 By: /s/--Tara Lee
21 TARA LEE
22 KEITH H. FORST
23 DANIEL P. MACH
24 Attorneys for Defendants

25 In association with:
26 E. LEIF REID
27 KRISTEN L. MARTINI
28 Attorneys for Defendants

24 **IT IS SO ORDERED** this 17th day
25 of January, 2018.

26 
27 Peggy A. Leen
28 United States Magistrate Judge

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CERTIFICATE OF SERVICE

I caused the following document(s) to be served to the persons listed below via the Court's Case Management and Electronic Case Filing (CM/ECF) system:

STIPULATION TO EXTEND CLASS NOTICE DEADLINE

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1 **I declare under penalty of perjury that the foregoing is true and correct.**

2 DATED this 5th day of January, 2018.

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5 /s/ D'Metria Bolden

6 D'Metria Bolden
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